Letter - F6. United States Environmental Protection Agency Region IX. Signatory - Enrique Manzanilla.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

April 26, 2002

Mr. Bruce D. Ellis
Environmental Resources Management
Division
Phoenix Area Office (PXAO-1500)
Bureau of Reclamation
P.O. Box 81169
Phoenix, AZ 85069-1169

Dear Mr. Ellis,

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the **Imperial Irrigation District/San Diego County Water Authority Water Conservation and Transfer Project (IID/SDCWA water transfer) and Draft Habitat Conservation Plan (HCP), Southern California** (CEQ# 020030). Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our scoping comments for this project were provided on October 22, 1999.

The Imperial Irrigation District (IID) proposes to implement a water conservation and transfer project that would conserve and transfer up to 300,000 acre-feet per year (afy) of Colorado River water to San Diego County Water Authority (SDCWA), Metropolitan Water District (MWD), and Coachella Valley Water District (CVWD) (Proposed Project). Water for transfer would be conserved by implementing on-farm irrigation system improvements, water delivery system improvements, and/or fallowing. The terms of the water conservation and transfer transactions are set forth in the IID/SDCWA 1998 Transfer Agreement, as amended, and the Colorado River Quantification Settlement Agreement (QSA) to be executed by IID, CVWD, and MWD.

The objectives of the project are, 1) to respond to the State Water Resources Control Board's (SWRCB) directive for IID to develop and implement a conservation program while protecting IID's water rights; 2) to increase the reliability of the water supplies for SDCWA, MWD, and CVWD; and 3) to help settle, by consensual agreement, long-standing disputes regarding the quantity, priority, use, and transferability of Colorado River water. The transfer, which would remain in effect for up to 75 years, will facilitate efforts to reduce California's diversions of Colorado River water in normal years to its annual 4.4 million acre-feet (maf) legal apportionment. The Secretary of the Interior (through the Bureau of Reclamation) must approve the change in the point of delivery for the transferred water.

The Proposed Project and alternatives include implementation of a Habitat Conservation Plan (HCP) to address impacts to threatened and endangered species and their habitats protected

Return to Contents

by the Endangered Species Act (ESA). This HCP includes specific conservation strategies for the Salton Sea, tamarisk scrub habitat, drain habitat, desert habitat, agricultural field habitat, burrowing owls, desert pupfish, and razorback suckers. The Salton Sea strategy includes two approaches: 1) construction and operation of a fish hatchery and 5,000 acres of fish ponds; or 2) conservation of sufficient additional water (beyond that conserved for transfer) to replace water lost to the Sea such that there would be no change in inflow to the Salton Sea.

Alternatives evaluated in the DEIS include the Proposed Project - water conservation and transfer of up to 300,000 afy to SDCWA, CVWD, and/or MWD with all conservation measures; Alternative 1 - no project; Alternative 2 - water conservation and transfer of up to 130,000 afy to SDCWA with on-farm irrigation system improvements as the exclusive conservation measures; Alternative 3 - water conservation and transfer of up to 230,000 afy to SDCWA, CVWD, and/or MWD with all conservation measures; and Alternative 4 - water conservation and transfer of up to 300,000 afy to SDCWA, CVWD, and/or MWD with fallowing as the exclusive conservation measure.

EPA endorses the effort to reduce Southern California's historic use of Colorado River water to California's legal apportionment of 4.4 million acre-feet per year (maf/yr) while minimizing the adverse effects on beneficial uses. We advocate use of all available tools to assure a long-term, sustainable balance between available water supplies, ecosystem health and water supply commitments. These tools include water transfers and exchanges, conservation, tiered pricing, irrigation efficiencies, operational flexibilities, market-based incentives, water acquisition, conjunctive use, voluntary temporary or permanent land fallowing, and wastewater reclamation and recycling. We urge aggressive implementation of water use efficiencies to maximize beneficial use of the transfer water and to achieve and maintain a sustainable balance between water supply and demand.

F6-1

We are concerned with the public review process for the environmental documentation for the QSA, Department of Interior's Implementation Agreement (IA), which enables implementation of the QSA, and the IID/SDCWA water transfer. Although the IA, QSA, and IID/SDCWA water transfer are inextricably linked, the comment deadline dates are not related or in a logical sequence (i.e., programmatic to project-specific level of evaluation). Thus, it is difficult for the public, local, state, and Federal entities to provide comprehensive comments on all three actions. In addition, other actions such as the Salton Sea Restoration Project and Coachella Valley Water Management Plan, which are directly relevant to the potential impacts of the QSA and IID/SDCWA water transfer and which can only be fully evaluated within the context of these projects, have not yet been released for public review.

Our comments on the IA and QSA were submitted on March 26, 2002 and April 16, 2002, respectively. Our comments on the IA DEIS, QSA Draft Program Environmental Impact Report, and IID/SDCWA water transfer DEIS should be considered together and are incorporated by reference into our comments on each individual action. EPA provided comments on the Salton Sea Restoration Project DEIS on May 16, 2000. These comments are incorporated by reference, given the potential adverse effects of the proposed water transfer on the Salton Sea. If you would like a copy of these comments, please call Laura Fujii, of my staff, at (415) 972-3852.

Response to Comment F6-1

Please refer to the Master Responses on *Other—Relationship Between the Proposed Project and the Salton Sea Restoration Project* and *Other—Relationship Between the Proposed Project, QSA, IA, IOP,* and *CVWD Groundwater Management Plan* in Section 3 of this Final EIR/EIS.

Return to Contents

Based on our review of the DEIS, EPA objects to the environmental impacts of the proposed IID/SDCWA water transfer action and finds that the DEIS relies on insufficient information to evaluate key components of the action for the following reasons:

F6-2 – Significant adverse effects to surface and groundwater quality and the lack of mitigation for these adverse effects. For example, the magnitude and extent of exceedences of the selenium aquatic life criteria would increase (pg. 3.1-106) in IID drains and the New and Alamo Rivers, and total dissolved solids (TDS) could increase in Coachella Valley groundwater (pg. 5-34);

F6-3 – Significant air quality impacts and exceedences of particulate matter less than 10 microns in diameter (PM10) in a PM10 nonattainment area (pg. ES-29);

F6-4 – The lack of evaluation of potential impacts to Indian Tribes or Indian Trust Assets from all proposed actions throughout the project area. A total of thirty-five Indian tribes (see attached list) could be affected by the proposed IID/SDCWA water transfer actions and related actions (e.g., Interim Surplus Guidelines, QSA).

F6-5 – Significant impacts to biological resources, especially at the Salton Sea. The IID/SDCWA water transfer would result in a more rapid collapse of the Sea's fisheries, displacement of sizable migratory bird populations, and exposure of up to 67,000 acres of currently inundated sediment.

F6-6 – Insufficient information to fully assess the feasibility of the Habitat Conservation Plan. We question the ability of the HCP to provide sufficient mitigation to reduce adverse biological effects to a level below significance.

F6-7 – Insufficient information to assess adequately the environmental impacts that should be avoided in order to protect the environment and human health. For instance, only direct effects of narrowly defined Federal actions are evaluated for Indian Trust Assets, socio-economic, environmental justice, and transboundary impacts. In addition, no mitigation measures are identified for these potential adverse effects.

F6-8 Environmental objections indicate that our review has identified significant environmental impacts that should be avoided, via corrective measures or selection of another project alternative, to adequately protect the environment. We note that the DEIS clearly states that fallowing (e.g., Alternative 4) and provision of replacement water for the Salton Sea (HCP Approach 2) would avoid or reduce significant and unavoidable impacts to water quality, air quality, biological resources, and recreation (pgs. 3.1-113, 4-13, 5-48). Detailed comments are enclosed with specific recommendations on how to address our objections. Our goal is to ensure comprehensive disclosure of critical issues and adverse impacts and to first avoid and, then minimize impacts to human health and the environment to the greatest extent practicable. The

Response to Comment F6-2

Please refer to the Master Response on *Hydrology—Selenium Mitigation* in Section 3 of this Final EIR/EIS. Refer also to the detailed responses to Comments F6-15 and F6-17.

Response to Comment F6-3

Please refer to the Master Response on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* in Section 3 of this Final EIR/EIS.

Response to Comment F6-4

The Draft EIR/EIS has been revised to include additional information on potential impacts to the Torres-Martinez Tribe, based on government-to-government consultation with the Tribe. The revisions also include a description of potential impacts to five other Tribes in the Coachella Valley from the use of transferred water by CVWD. These changes are indicated in this Final EIR/EIS in subsection 3.9 under Section 4.2, Text Revisions. Please also refer to the responses given for Comments F6-23, -24, and -25.

Response to Comment F6-5

Please refer to the Master Response on *Biology —Approach to the Salton Sea Habitat Conservation Strategy* in Section 3 of this Final EIR/EIS.

Response to Comment F6-6

The comment indicates an inability to fully assess the feasibility of the HCP, but is not specific about what aspects of the plan are of concern or which data are insufficient. The revisions to the approaches to mitigating Salton Sea impacts might address this concern. See the Master Response on *Biology—Approach to Salton Sea Habitat Conservation Strategy* in Section 3 of this Final EIR/EIS.

Return to Contents

Response to Comment F6-7

Sections 3.14 and 3.16, Socioeconomics and Transboundary Impacts of the Draft EIR/EIS, respectively, address both direct and indirect impacts of the Proposed Project. In addition, the Indian Trust Assets and Environmental Justice sections (Sections 3.9 and 3.15 of the Draft EIR/EIS, respectively) have been revised substantially to address this comment and other comments on these sections. The new sections are located in this Final EIR/EIS in subsections 3.9 and 3.15 under Section 4.2,Text Revisions. Thus, all NEPA-only sections currently address both direct and indirect effects of the Proposed Project.

With regard to the comment on mitigation measures, with the exception of socioeconomic impacts because of fallowing in the Imperial Valley, such measures have been proposed for the potential adverse effects described in the NEPA-only sections, as necessary and applicable (for information on the air quality and sport fishery mitigation measures in the Salton Sea subregion, refer to the Master Responses for *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* and *Recreation—Mitigation for Salton Sea Sport Fishery* in Section 3 of this Final EIR/EIS. The IID Board will make a decision on mitigation for socioeconomic impacts because of fallowing in the Imperial Valley, if and when it approves the Proposed Project or an alternative to the Proposed Project. The groundwater impacts associated with the increase in TDS in the Coachella Valley have been determined to be significant and unavoidable. Agricultural resources impacts have also been determined to be significant and unavoidable if permanent/long-term fallowing is employed as a conservation measure in the Proposed Project.

Response to Comment F6-8

Comment noted. Together, the Draft and Final EIR/EIS disclose the significant environmental issues associated with implementation of the Proposed Project and Alternatives.

F6-8

identified additional information, analyses, and discussions should be included in the Final EIS (FEIS).

On the basis of these objections, we have rated the DEIS as EO-2, Environmental Objections - Insufficient Information (see attached "Summary of the EPA Rating System"). We appreciate the opportunity to review this DEIS and look forward to working with you on these issues on May 17, 2002.

The issues of quantity, priority, use, and transferability of Colorado River water within southern California and the Lower Colorado River basin are extremely complex and controversial with many diverse stakeholders. We urge Reclamation to take a leadership role in developing a forum that will pull all these disparate stakeholders together in an effort to resolve outstanding issues and to develop a comprehensive, reliable, and long-term sustainable water supply for southern California.

Should you have questions, please call Laura Fujii, of my staff, at (415) 972-3852, email: fujii.laura@epa.gov. Please send three copies of the final EIS to our office when it is officially filed with our HQ EPA Office of Federal Activities

Sincerely,

Signed by Enrique Manzanilla

Enrique Manzanilla, Director
Cross Media Division

Enclosures: Detailed Comments (15 pages)
Summary of the EPA Rating System
List of Potentially Affected Indian Tribes
Guidance for Incorporating Environmental Justice Concerns

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Return to Contents

Filename: iidwatertransferdeis2.wpd

cc: William Rinne, BOR
Carol Roberts, USFWS
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Elston Grubaugh, IID
Water Resources Division, USGS, Yuma, AZ.
Southern California Agency, BIA
Sacramento and Phoenix Area Offices, BIA
Affected Indian Tribes (see attached list)

Return to Contents

DETAILED COMMENTS

Scope of the Evaluation and Water Supply Reliability Implications

F6-9

1. Efforts to determine the quantity, priority, use, and transferability of Colorado River water within southern California and the Lower Colorado River basin are necessary and challenging. Any approach should take into consideration potential effects on the entire region. This includes the Imperial Valley, Coachella Valley, Salton Sea, Lower Colorado River Basin and Colorado River Delta (Delta). The region should be considered in its entirety because actions taken in one part of the Basin, particularly those related to additional or modified water diversions, could have significant adverse cumulative impacts on other parts of the Basin. For instance, cumulative reduction in Lower Colorado River flows is threatening the ecological viability of the Delta. On the other hand, due to the limited storage capacity of Morelos Dam (Mexico), recent flood flows have reached the Delta significantly rejuvenating this ecosystem.

Recommendation:

We urge the Bureau of Reclamation (Reclamation), Imperial Irrigation District (IID), Coachella Valley Water District (CVWD), and Metropolitan Water District (MWD) to take a broad, regional approach in determining water supply reliability and the potential impacts of water supply actions on other resources and parts of the Lower Colorado River basin. For instance, the final environmental impact statement (FEIS) should include an evaluation of the effects of the IID/San Diego County Water Authority (SDCWA) water transfer on the water needs for the Lower Colorado River Multi-Species Conservation Program and the Delta.

F6-10

2. Although the Draft EIS states that the water transfer will facilitate efforts to reduce California's diversions of Colorado River water in normal years to its annual 4.4 million acre-feet (maf/yr) legal apportionment, it is not clear how this reduction in Colorado River diversions would be achieved or ensured. For example, even though the IID/MWD 1988 conservation and transfer project professed to improve water use efficiencies, the actual diversion of Colorado River water by IID has increased.

Recommendation:

The FEIS should include a description of how the proposed water transfer would help to reduce California's Colorado River use to 4.4 maf/yr while maintaining MWD's historic use of 1.25 maf/yr. We recommend this description include tables that show the various water transfers and exchanges and the contribution that each action makes to bring California's use down to its 4.4 maf/yr allocation and/or provides for maintenance of 1.25 maf/yr in the Colorado River Aqueduct.

Response to Comment F6-9

There are already adequate programs in place that monitor and account for use of Colorado River water. Reclamation, under the "Law of the River" and specifically the 1964 Supreme Court Decree in *Arizona v. California*, has the responsibility to prepare and maintain complete, detailed, and accurate records of diversions of water from the mainstream of the Colorado River, return flow of such water to the stream that is available for consumptive use in the United States or in satisfaction of the Mexican treaty obligation, and consumptive use of such water. This use is recorded separately for each diverter from the mainstream, each point of diversion and each of the states of Arizona, California, and Nevada. The results are provided in an Annual Decree Accounting Report prepared by Reclamation's Lower Colorado Region.

Return to Contents

Response to Comment F6-10

The Draft EIR/EIS provides a description of the California Plan in Section 1.4.6 and diagrams IID's role in the plan in Figure 1-12. In addition, Chapter 2 of the QSA PEIR, which is incorporated into the Draft EIR/EIS by reference, includes a detailed description of how the Proposed Project will assist California in reducing its Colorado River water use in normal years to its annual 4.4 MAFY apportionment. Table 2.5.1 from the QSA PEIR is included below for reference.

TABLE 2.5-1
Anticipated Changes in River Flow from Parker to Imperial Dams in a Normal Year as a Result of the Proposed Project (negative numbers in parentheses)

	Minimum (KAFY)	Maximum (KAFY)
Proposed Project	0	(300)
Amendment to the IID/MWD 1988 Agreement and Subsequent Agreements	20	20
All American Canal Lining Project[1]	(67.5)	(67.5)
Coachella Canal Lining Project[1]	(26)	(26)
CVWD/MWD SWP Transfer and Exchange	35	0
Miscellaneous PPRs and Federal Reserved Rights	(14.5)	(14.5)
TOTAL	**(183.2)**	**(388.2)**

Notes: [1] 11.5 and 4.5 KAFY from the All American and Coachella Canal lining projects, respectively, would be made available for San Luis Rey Indian Water Rights Settlement Act purposes.

The commenter also notes that IID's diversions of Colorado River water have been increasing. Review of IID cropping and water delivery data shows that these increases in diversions correspond with a period when growers within the IID have been increasing the intensity of their irrigated land use. Because the proportion of the time when irrigated parcels, on average across the IID, are being planted to crops, this translates to a higher volumes of water being delivered to each parcel, although not to each crop, and higher diversions to the IID. Because these increases in deliveries to parcels are not equivalent to an IID-wide increase in water use by individual crops, these increases do not correspond to a reduction in irrigation efficiency. Refer to the Master Response on *Hydrology—Development of the Baseline* in Section 3 of this Final EIR/EIS.

3. EPA believes a clear accounting of the sources and quantity of water for all proposed actions is key in determining the feasibility of the proposed water transfer actions and Habitat Conservation Plan (HCP) measures. Such an evaluation is especially important given the increasing competition for scarce water supplies.

Recommendation:

F6-11 The FEIS should include a clear accounting of the sources and quantity of water for all proposed actions. For example, provide a table describing the water source(s) and quantities for proposed HCP measures such as the proposed 190 to 652 acres of managed marsh (pg. 2-46). The accounting of water sources should include an evaluation of existing uses such as the water used by duck clubs and wildlife refuges. For example, describe whether water for the duck clubs and refuges is purchased from IID and whether this use of Colorado River water is a designated beneficial use.

4. Effective and sustainable management of water supplies depends on accurate information about water supply availability and water use. This data can only be obtained through a program of monitoring and accounting of water supply and demand. The DEIS does not include a plan to monitor the activities to be undertaken, except in general terms, nor does it indicate how such an effort would be funded.

Recommendation:

F6-12 We urge Reclamation, IID, MWD, and CVWD, in partnership with the regulatory agencies and local communities, to make a firm commitment to timely and accurate monitoring and accounting. This commitment should include dedicated funding for the monitoring/accounting effort. The FEIS should describe proposed monitoring, accounting methods, enforcement tools, and assurance measures that will be used to verify, validate, and ensure effective implementation of the water conservation and transfer actions. Given the proposed transfer of significant amounts of water, the FEIS should persuasively demonstrate that water will be put to reasonable beneficial use and that there will be safeguards against misuse of the water.

F6-13 5. The DEIS states that there would be no socioeconomic impacts (Section 3.14) or biological resource impacts (pg. 3.2-12) in the SDCWA area because there would be no induced growth (pg. 5-37). This conclusion is based upon the fact that the transfer water would replace water currently purchased from MWD. However, the IID/SDCWA water transfer appears to replace an existing unreliable water supply (priority 4, 5 or 6 water), purchased from MWD, with a reliable supply (priority 3 water), purchased from IID. Increased reliability of the water supply could significantly influence future regional land use planning and future development. In addition, by replacing the existing unreliable water supply with a more reliable one, new water supply sources may then be available for other future beneficial uses.

Response to Comment F6-11

The HCP identifies several mitigation measures that would be supported by water. As indicated in the HCP, mitigation of drain habitat would require the creation and maintenance of up to 652 acres of managed marsh, which could require between 9 and 12 acre-feet of water per year. Mitigation for tree habitat also would require the application of water to create and maintain tree habitat. The actual amount of created tree habitat would depend on the extent of impact (primarily to tamarisk scrub adjacent to the Salton Sea) and whether the habitat was created before or after the impact. Although extremely unlikely, the maximum requirement specified in the HCP could be up to about 2,200 acres. Water requirements for creating and establishing tree habitat could be as high as about 6 acre-feet per acre per year, with water requirements for maintenance less dependent on local soil conditions. Because of the uncertain nature of the mitigation requirements, a detailed accounting of water use as requested in the comment is not possible. However, Colorado River water (conserved through efficiency conservation or fallowing) likely would be used to support the managed marsh. Conserved water also might be used to support created tree habitats, but drain water could be used if available at suitable quality. Currently, duck clubs use either pumped groundwater where water quality is suitable or water purchased from IID. The refuges also purchase their water from IID.

Response to Comment F6-12

Reclamation is currently and has been monitoring diversions, return flows and consumptive uses by water users along the Colorado River since 1964. Reclamation is required by the Supreme Court (Article V, Supreme Court Decree in Arizona v. California dated March 9, 1964) to prepare and maintain complete, detailed and accurate annual records of releases of water through regulatory structures, diversions, returns and consumptive uses by State and diverter. In addition to monthly reporting and end of year accounting, Reclamation approves water use estimates by major water users before the beginning of each calendar year. Title 43, CFR 417 requires entitlement holders to provide an estimate of monthly diversion requirements for Reclamation's planning purposes, prior to the beginning of the calendar year. The diversion requirements are reviewed to ensure that the delivery request does not exceed contract holders entitlements, the water requested is put to beneficial use, the water will be available in the system and water conservation measures are put into place.

Return to Contents

Response to Comment F6-13

It is not anticipated that the SDCWA geographic area would experience increased environmental impacts with respect to biological and socioeconomic impacts as a result of increased growth in the San Diego region because it has been determined that the Proposed Project is not growth-inducing. Please refer to the Master Response on *Other—Growth Inducement Analysis* in Section 3 of this Final EIR/EIS.

Recommendations:

We recommend the FEIS describe the indirect impacts of replacing an unreliable water supply with a reliable supply. For instance, the IID/SDCWA water transfer may remove the SB 221 barrier to new development, which prohibits approval of new developments of at least 500 units unless a sufficient water supply is available. The FEIS should also reevaluate and validate the assumption that no socioeconomic or biological resource impacts would occur in the SDCWA area.

The FEIS should also address the consequences of Alternative 1, No Project, within the SDCWA region. If the IID/SDCWA water transfer does not occur, then SDCWA would continue to purchase water from MWD. It is clear from the DEIS that a large portion of MWD's Colorado River water supply is highly unreliable because it is based upon lower priority, surplus Colorado River water which may no longer be available on a sustainable basis.

F6-13

Water Quality

F6-14

1. EPA objects to the projected increase in concentration and magnitude of exceedences of the selenium aquatic life criteria in the New and Alamo Rivers and IID agricultural drains (pgs. 3.1-105 to 111). As noted in the DEIS, the concentration of selenium in many locations already exceeds EPA's aquatic life criteria of 5 micrograms per liter (µg/l). We are also concerned with the potential for increased concentrations of perchlorate, boron, nutrients, pesticides, sediments, metals, and total dissolved solids in surface waters. An increase in water temperatures is also a concern since it may have adverse effects on an already stressed biological system. Our concern is heightened by the presence of fish-eating migratory birds and other threatened and endangered fish and wildlife species that could be adversely affected by these harmful constituents and by the bioaccumulation of selenium up the food chain.

Recommendations:

The DEIS states that there is no reasonable mitigation available to reduce the concentration of selenium. EPA disagrees with this statement. Although control of selenium is a difficult challenge, efforts are underway in the Central Valley of California and other locations in the West to address selenium concentration levels in agricultural drain water.

We recommend the FEIS evaluate potential mitigation measures to address the adverse increase in concentration of constituents of concern such as selenium. Potential mitigation measures include biological and chemical selenium removal; integrated drainage management; desalination; evaporation ponds; deep well injection of extremely poor drainwater; and beneficial uses of drain water and salts.

Response to Comment F6-14

The Master Response on *Hydrology—Selenium Mitigation* in Section 3 of this Final EIR/EIS, addresses selenium-related issues raised in this comment, and the Master Response on *Hydrology—TMDLs* addresses how the Proposed Project would be likely to alter concentrations of sediment and nutrients. As the Draft EIR/EIS explains, the reductions in sediment and nutrient loadings that would result from implementation of the Proposed Project would lead to parallel reductions in pesticide loadings because the mechanisms that govern sediment and nutrients loadings to drains also apply to pesticides.

With respect to temperature, the reduced proportion of drainage flow originating from tailwater and the increased proportion contributed from tilewater would be likely to have a moderating effect on the temperature of waters discharged to drains and lead to an overall reduction of the temperature of drainage flows at their points of entry to the drainage system. In addition, the Master Response on *Biology—Approach to Salton Sea Habitat Conservation Strategy* in Section 3 of this Final EIR/EIS describes how additional water would be routed through the IID system for discharge to the Sea. Although the source of this mitigation water may vary, it would undoubtedly be cooler than the tailwater discharge that it replaces. Therefore, given the greater proportion of tilewater in drainage flows and the routing and discharge of mitigation water, it is unlikely that water temperatures in IID drains and in the Salton Sea under the Proposed Project would be higher than those under the Project Baseline.

Return to Contents Continue >>